

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

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MICHAEL P. O'NEIL and NICOLA  
GRASSO,

*Plaintiffs,*

v.

PETER F. NERONHA, in his Official  
Capacity as Attorney General of  
Rhode Island and COLONEL JAMES  
M. MANNI, in his Official Capacity as  
The Superintendent of the Rhode  
Island State Police,

*Defendants.*

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C.A. No. 1:19-cv-612-WES-PAS

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiffs Michael P. O'Neil and Nicola Grasso ("Plaintiffs") and Peter F. Neronha, in his official capacity as Attorney General of Rhode Island, and James M. Manni, in his official capacity as the superintendent of the Rhode Island State Police ("Defendants") (collectively "the parties"), respectfully jointly request a 30-day extension of the deadlines set forth in Rule 54 of the Federal Rules of Civil Procedure and Rules 54 and 54.1 of the Local Rules of Civil Procedure regarding seeking costs and attorneys' fees. Pursuant to these rules, any motion seeking costs and attorneys' fees must be filed within 14 days of the judgment, which in this case would be by March 29, 2022. The parties jointly request that the Court extend that deadline by 30 days up to and including April 28, 2022. The parties assert that granting the requested extension will promote judicial economy and provide an

opportunity for the parties to potentially reach an agreed-upon resolution regarding these matters without the need for court intervention.

Wherefore, the parties request that the Court grant the requested extension and extend the deadline for filing any motion for attorneys' fees or costs up to and including April 28, 2022.

Respectfully submitted,

PLAINTIFFS,

By their Counsel:

/s/ Frank R. Saccoccio

Frank R. Saccoccio, Esq. #5949  
Comerford & Saccoccio  
928 Atwood Avenue  
Johnston, Rhode Island 02919  
(401) 944-1600 \* 942-8921 Fax  
Frank.CSLawOffice@gmail.com

s/ Alan Alexander Beck

Law Office of Alan Beck  
2692 Harcourt Drive  
San Diego, CA 92123  
(619) 905-9105  
Hawaii Bar No. 9145  
Alan.alexander.beck@gmail.com  
\*Admitted Pro Hac Vice

/s/ Stephen D. Stamboulieh

Stephen D. Stamboulieh  
Stamboulieh Law, PLLC  
P.O. Box 428  
Olive Branch, MS 38654  
(601) 852-3440  
stephen@sdslaw.us  
MS Bar No. 102784  
\*Admitted Pro Hac Vice

DEFENDANTS,  
in their official capacities only

By,

PETER F. NERONHA  
ATTORNEY GENERAL

/s/ Katherine Connolly Sadeck  
Katherine Connolly Sadeck (8637)  
Special Assistant Attorney General  
150 South Main Street  
Providence, RI 02903-2907  
Tel: (401) 274-4400 x 2480  
Fax: (401) 222-2995  
ksadeck@riag.ri.gov

**CERTIFICATION**

I hereby certify that I filed and served all counsel of record with a copy of the within through the ECF filing system on this 17<sup>th</sup> day of March, 2022, and that it is available for viewing and downloading by counsel of record:

Frank R. Saccoccio, Esq. #5949  
Comerford & Saccoccio  
928 Atwood Avenue  
Johnston, Rhode Island 02919  
(401) 944-1600 \* 942-8921 Fax  
Frank.CSLawOffice@gmail.com

Law Office of Alan Beck  
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stephen@sdslaw.us  
MS Bar No. 102784  
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/s/ Katherine Connolly Sadeck